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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
DPH HOLDINGS CORP., <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Reorganized Debtors.	:	(Jointly Administered)
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**RESPONSE OF ATS AUTOMATION TOOLING SYSTEMS INC., ATS MICHIGAN
SALES AND SERVICE INC, ATS OHIO INC. AND ATS WICKEL UND
MONTAGETECHNIK AG TO REORGANIZED DEBTORS'
FORTY-THIRD OMNIBUS CLAIMS OBJECTION**

ATS Automation Tooling Systems Inc. (“**ATS Automation**”), ATS Michigan Sales and Service Inc. (“**ATS Michigan**”), ATS Ohio Inc., (“**ATS Ohio**”), and ATS Wickel Und Montagetechnik AG (“**ATS Wickel**” and, collectively with the foregoing entities, the “**ATS Entities**”), submit this response (the “**Response**”) to the Reorganized Debtor’s’ Forty-Third Omnibus Objection Pursuant to 11 U.S.C. § 503(b) and Fed. R. Bankr. P. 3007 to (I) Expunge Certain Administrative Expense (A) Severance Claims, (B) Books and Records Claims, (C) Duplicate Claims, (D) Equity Interests, (E) Prepetition Claims, (F) Insufficiently Documented Claims, (G) Pension, Benefit, and OPEB Claims, (H) Workers’ Compensation Claims, and (I), (II) Modify and Allow Certain Administrative Expense Severance Claims, and (III) Allow Certain Administrative Expense Severance Claims (the “**Objection**”), in which the Reorganized

Debtors object to proofs of claim numbered 15668, 18684, 19763, 18687, 19762, 18685, 19761, 18686, and 19760, filed by the ATS Entities, and state as follows:

1. The ATS Entities supplied debtors in the above-captioned bankruptcy cases (the “Cases”) with goods and machinery pursuant to contracts, purchase orders, invoices, and other contractual documents and agreements.

2. The ATS Entities have filed the following proofs of claim, asserting claims with administrative priority in the following amounts:

<u>Claim Number</u>	<u>Entity Name</u>	<u>Filed Claim Amount</u>
15668	ATS Automation Tooling Systems Inc.	\$2,218,225.00
18684	ATS Automation Tooling Systems Inc.	FOREIGN
19763	ATS Automation Tooling Systems Inc.	UNLIQUIDATED
18687	ATS Michigan Sales and Service Inc.	\$160,664.00
19762	ATS Michigan Sales and Service Inc.	\$192,040.00
18685	ATS Ohio Inc.	\$1,824,613.00
19761	ATS Ohio Inc.	\$71,847.00
18686	ATS Wickel Und Montagetechnik AG	\$37,375.00
19760	ATS Wickel Und Montagetechnik AG	\$9,836.00

The foregoing proofs of claim collectively represent the “**ATS Entities’ Administrative Claims.**”

3. The ATS Entities have submitted extensive documentation to the Reorganized Debtors in an effort to determine consensually with the Reorganized Debtors the latter’s remaining payment obligations with respect to the ATS Entities’ Administrative Claims.

4. The ATS Entities prepared this Response in consultation with counsel for the Reorganized Debtors and file same in order to preserve all rights they have in opposition to the Objection, activate the claims objection procedures authorized by the Court in the Cases, and cause adjournment of any hearing on the Objection as to the ATS Entities' Administrative Claims to a future date pursuant to those procedures.

CONCLUSION

5. For the reasons set forth above, the ATS Entities respectfully request that the Court adjourn the hearing on the ATS Entities Administrative Claims to afford the parties an opportunity to resolve consensually the issues raised in the ATS Entities' Administrative Claims and the Objection.

Respectfully Submitted,

CLARK HILL PLC

/s/ Robert D. Gordon

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